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10 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, as trustee for Morgan Stanley*
11 *ABS Capital I Inc. Trust 2007-NC1 Mortgage Pass-through Certificates, Series 2007-NC1*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 DEUTSCHE BANK NATIONAL TRUST
15 COMPANY, AS TRUSTEE FOR MORGAN
16 STANLEY ABS CAPITAL I INC. TRUST
17 2007-NC1 MORTGAGE PASS-THROUGH
18 CERTIFICATES, SERIES 2007-NC1, a
19 California Company,

20 Plaintiff,

21 vs.

22 AIRMOTIVE INVESTMENTS, LLC, a Nevada
23 Limited Liability Company, HIGHLAND
24 RANCH HOMEOWNERS ASSOCIATION, a
25 Nevada non-profit corporation,

26 Defendants.

Case No.: 3:15-cv-00401-LRH-WGC

27 **STIPULATION TO EXEND TIME FOR**
28 **DEUTSCHE BANK TO FILE ITS THIRD**
AMENDED COMPLAINT

(First Request)

29 COMES NOW Plaintiff, Deutsche Bank National Trust Company, as trustee for Morgan
30 Stanley ABS Capital I Inc. Trust 2007-NC1 Mortgage Pass-through Certificates, Series 2007-
31 NC1 (hereinafter "Deutsche Bank"), Defendant Airmotive Investments, LLC ("Airmotive"), and
32 Defendant Highland Ranch Homeowners Association ("Highland Ranch") (collectively referred
33 to as "The Parties"), by and through their respective undersigned counsel, hereby stipulate and
34 agree as follows:

1 The Parties filed a Stipulation to Withdraw Highland Ranch Homeowners Association's Motion
2 for Partial Dismissal, or in the Alternative, Partial Summary Judgement [ECF No. 66] and for
3 Deutsche Bank to File its Third Amended Complaint on March 20, 2019 [ECF No. 82]. This
4 Court filed its Order Granting the Stipulation to Withdraw Highland Ranch Homeowners
5 Association's Motion for Partial Dismissal, or in the Alternative, Partial Summary Judgement
6 and for Deutsche Bank to File its Third Amended Complaint on March 21, 2019, which set the
7 deadline for Deutsche Bank to file it's Third Amended Complaint on or before April 18, 2019
8 [ECF No. 83].

9 After filing the Stipulation, the Parties entered into settlement negotiations which would
10 resolve the instant litigation in its entirety in the event an agreement is reached. In order to avoid
11 unnecessary litigation expenses while the Parties discuss settlement, Deutsche Bank is requesting
12 an additional thirty (30) days, up to May 20, 2019, to file it's Third Amended Complaint. This
13 extension is requested in good faith and is not for purposes of delay or prejudice to any other
14 party.

15 WHEREFORE, based on the foregoing, IT IS HEREBY STIPULATED AND AGREED
16 that the deadline for Deutsche Bank to file its Third Amended Complaint shall be extended to
17 May 20, 2019.

18 Dated this 18th day of April 2019.

Dated this 18th day of April 2019.

19 WRIGHT, FINLAY & ZAK, LLP

LAXALT & NOMURA, LTD.

20 /s/ Lindsay D. Robbins

/s/ Ryan Leary

21 Lindsay D. Robbins, Esq.

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26 *ABS Capital I Inc. Trust 2007-NC1*

Attorney for Highland Ranch Homeowners
Association

27 *Mortgage Pass-through Certificates, Series*
28 *2007-NC1*

1 Dated this 18th day of April 2019.

2 ROGER P. CROTEAU & ASSOCIATES,
3 LTD

4 /s/ Timothy E. Rhoda

5 Roger P. Croteau, Esq.

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11 *Attorney for Defendant, Airmotive*

12 *Investments, LLC*

13 **ORDER**

14 **IT IS SO ORDERED.**

15 DATED this 19th day of April 2019.

16 

17 UNITED STATES DISTRICT COURT JUDGE